



State of Utah

DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 29, 1996

Mr. Steve Lackey
Barney's Canyon Mining Company
P.O. Box 311
Bingham Canyon, Utah 84006-0311

RE: Revegetation Studies, Barney's Canyon Mine, M/035/009, Salt Lake County, Utah

Dear Mr. Lackey:

I have reviewed the memorandum you faxed to me on March 28, 1996, with regards to our site visit on August 24, 1995. During that inspection, we evaluated the reclamation test plots and reclamation work that had been done at the Barney's Canyon Mine. When this document was originally submitted to the Division, we viewed it as Golder Associates field memo documenting our visit, and not as a formal request to change the approved depth of topsoil for final reclamation. However, I have now reviewed it in light of the potential to reduce overall topsoil depth for reclamation.

The Golder Associates memo makes several claims or assumptions with little data to back up these claims. For example, in section 2.1 (second page), it states, "No significant differences were evident between 6-inch and 12-inch topsoil depths." Yet, there was a marked visual difference in the height of vegetation between these plots and the species observed during our inspection. This memo also inferred that revegetation success could not be achieved on the 6-inch topsoil depth without the addition of sludge. Without hard data to show that the 6-inch topsoil depth meets or exceeds the revegetation success standard, the Division cannot approve a change for the entire mine site.

While on site, we discussed the possibility of reducing the soil depth to 6 inches on the 6400/6500 dump. However this was in light of the existing sludge test plots on this dump, which appeared to be doing better on the sludge treatments than on the topsoil treatments. Again, there was no hard data to show whether revegetation success standards would be achieved with the lesser topsoil amount. My recollection of our discussion was that formal DOGM approval to reduce the overall topsoil depth, would not be granted until we reviewed a formal Kennecott request and hard data that would demonstrate success could be achieved with the lesser amount. To date, we have not seen a formal request or the supporting data justifying such a request. During our meeting on March 20, 1996 I thought you were referring to this data (that I had not seen) and not the memorandum from Golder that you telefaxed to me on March 28, 1996.

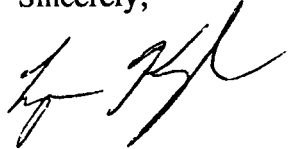


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In conclusion, the Division has not approved a reduction of the topsoil depth to be used at Barney's Canyon Mine. We will not make any further decision regarding this matter until Barney's Canyon Mining Company files a formal written request to change the approved topsoiling requirements. This request must be accompanied with sufficient data and alternative treatment plans (i.e. using sludge or other amendments), to warrant the reduced topsoil application.

Please feel free to call me or Wayne Hedberg if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lynn Kunzler', with a stylized flourish at the end.

Lynn Kunzler
Senior Reclamation Specialist

jb
cc: Lowell Braxton
Minerals Staff (route)
barney.let